EXHIBIT A

CONNECTION TO "RELATED CASES"

At the request of U.S. Probation and for the convenience of the Court, the government has provided a basic description of how this case is connected to "related cases." All information in this filing is derived from documents available on the public dockets in these cases. Related cases include:

1. Carlyann Amos (19-cr-10355-DPW)

2. Akeem Chambers (18-cr-10054-RWZ)

3. Emelyn Clough (21-cr-10171-FDS)

4. Lindsley Georges and Dave Guillaume (19-cr-10408-ADB)

5. Emeka Iloba (21-cr-10233-LTS)

6. Judemario Josaphat (21-cr-10044-DJC)

7. Fesnel Lafortune (19-cr-10246-DPW)

8. Lajerran Long (20-cr-10308-MLW)

9. Antonio Niati (18-cr-10341-MLW)

10. Valnardia Novas (20-cr-10221-DPW)

The government has not uncovered evidence that each co-conspirator knew all other co-conspirators and/or all the conduct involved in the broader conspiracy. Below is a summary of available information describing the defendants' conduct, how the cases are connected, and the procedural posture of each case.

1. **Carlyann Amos (19-cr-10355-DPW)**

    a. Fact Summary

Amos was a bank teller at Santander Bank (Weymouth, Massachusetts). Amos was initially recruited by Long, and later by Josaphat. Amos's role was to accept fake credentials presented to

her, without scrutiny, in order to facilitate the fraudulent transfer of money. Amos did this on multiple occasions between December 2017 and January 2018.

    b.   Procedural Posture

Amos pleaded guilty to a two-count Information charging 18 U.S.C. § 1349 (Bank Fraud Conspiracy) and 18 U.S.C. §§ 1028A and 2 (Aggravated Identity Theft; Aiding and Abetting). Amos was sentenced by Judge Woodlock on February 24, 2022, after consideration of a government motion filed under seal, to time served, three years of supervised release, and restitution of $357,333.01 (joint and several with Josaphat and Long).

2. Akeem Chambers (18-cr-10054-RWZ)

    a.   Fact Summary

Chambers was a bank teller at Santander Bank (Dorchester, Massachusetts). Chambers was recruited by Niati to facilitate fraudulent withdrawals from accounts at Santander Bank. Chambers facilitated those withdrawals on multiple occasions in April 2017.

    b.   Procedural Posture

Chambers pleaded guilty to a one-count Information charging 18 U.S.C. § 1349 (Bank Fraud Conspiracy). Chambers was sentenced by Judge Zobel on September 28, 2021, after consideration of a government motion filed under seal, to time served, three years of supervised release (the first six months in home confinement with electronic monitoring), and restitution of $360,891 (joint and several with other applicable defendants to be identified in a subsequent order).

3. Emelyn Clough (21-cr-10171-FDS)

    a. Fact Summary

Between approximately June 2017 and November 2017, Clough conspired with Iloba, Novas, Guillaume, and others. At Iloba's direction, Clough opened accounts at Citizens Bank in the name of a fictitious business that were used to negotiate fraudulently-obtained checks from other banks, and also deposited fraudulently-obtained funds into accounts in the names of fictitious businesses. Clough and Iloba also coordinated with Guillaume to launder funds, and recruited Novas (a bank teller at TD Bank) to facilitate fraudulent withdrawals from customer accounts.

    b. Procedural Posture

Clough pleaded guilty to a one-count Information charging 18 U.S.C. § 1349 (Bank Fraud Conspiracy). Clough was sentenced by Judge Saylor on May 10, 2022, after consideration of a government motion filed under seal, to time served, three years of supervised release (to include one year of home confinement and 100 hours of community service), and restitution of $463,983.84 (joint and several with Iloba, Novas, Guillaume, and Lafortune).

4. Lindsley Georges and Dave Guillaume (19-cr-10408-ADB)

    a. Fact Summary

Between approximately December 2017 and January 2018, Georges and Guillaume coordinated with Iloba and/or Clough (but primarily Iloba) to launder the proceeds from bank fraud. Georges and Guillaume opened bank accounts in the names of fictitious businesses, deposited fraudulently-obtained funds into those accounts, and withdrew a portion of those funds.

    b. Procedural Posture

Georges and Guillaume both pleaded guilty to a one-count Indictment charging 18 U.S.C. § 1956(h) (Money Laundering Conspiracy). Georges and Guillaume were sentenced by Judge

Burroughs on January 19, 2022 to time served, three years of supervised release (the first six months in home confinement), and restitution of $677,243.26 (Georges) and $457,243.26 (Guillaume).

5. Emeka Iloba (21-cr-10233-LTS)

a. Fact Summary

Between approximately April 2017 and March 2018, Iloba conspired with Clough, Guillaume, Niati, Novas, and others. Iloba directed Clough to open accounts at Citizens Bank in the name of a fictitious entity using a counterfeit means of identification. Iloba and Clough recruited Novas (a bank teller at TD Bank) to facilitate fraudulent withdrawals from customer accounts. Iloba also coordinated with Guillaume and/or Georges to open business accounts at Santander Bank and Citizens Bank in the name of fictitious entities and to process fraudulently-obtained checks through those accounts.

Iloba also introduced Niati to other participants in the scheme and facilitated the provision of fraudulent identification documents to Niati for the purpose of carrying out the scheme. Niati, in turn, recruited Chambers (a bank teller at Santander Bank) to facilitate fraudulent withdrawals from customer accounts, as well as Lafortune (a money launderer) to open accounts in the names of fictitious businesses.

b. Procedural Posture

Iloba pleaded guilty to a two-count Information charging 18 U.S.C. § 1349 (Bank Fraud Conspiracy) and 18 U.S.C. §§ 1028A and 2 (Aggravated Identity Theft; Aiding and Abetting). Iloba was sentenced by Judge Sorokin on February 25, 2022, after consideration of a government motion filed under seal, to: (1) on Count One, nine months of imprisonment, five years of supervised release, and $1,672,677.10 in restitution (joint and several with other defendants as

specified in the judgment), and (2) on Count Two, twenty-four months of imprisonment, to be served consecutively to the term imposed on Count One, and one year of supervised release, to be served consecutively to the term imposed on Count One.

6. **Judemario Josaphat (21-cr-10044-DJC)**

a. Fact Summary

Between approximately December 2017 and February 2018, Josaphat conspired with Long, Amos, and others. Josaphat obtained an introduction to Amos (a bank teller at Santander Bank) through Long (Amos's acquaintance) and then coordinated directly with Amos to facilitate fraudulent withdrawals from customer accounts at Santander Bank. Josaphat paid Long for the introduction to Amos, and Long, in turn, paid Amos for her role in facilitating the fraudulent withdrawals.

b. Procedural Posture

Josaphat pleaded guilty to a two-count Indictment charging 18 U.S.C. § 1349 (Bank Fraud Conspiracy) and 18 U.S.C. §§ 1028A and 2 (Aggravated Identity Theft; Aiding and Abetting). Josaphat's sentencing is scheduled for September 12, 2022 before Judge Casper.

7. **Fesnel Lafortune (19-cr-10246-DPW)**

a. Fact Summary

In approximately April 2017, Lafortune worked with Niati to open business accounts at TD Bank using fraudulent identification documents. Those business accounts were used to launder funds fraudulently obtained from Santander Bank customer accounts. Lafortune was recruited by Niati to participate in the scheme.

b.   Procedural Posture

Lafortune pleaded guilty to a two-count Indictment charging 18 U.S.C. § 1349 (Bank Fraud

Conspiracy) and 18 U.S.C.§ 1028A (Aggravated Identity Theft). Lafortune was sentenced by

Judge Woodlock on June 25, 2021, after consideration of a government motion filed under seal,

to: (1) on Count One, seven months of imprisonment, five years of supervised release, and

$201,400.95 in restitution, and (2) on Count Two, twenty-four months of imprisonment,

consecutive to the term imposed on Count One, and one year of supervised release, concurrent

with the term imposed on Count One. Lafortune had a criminal history category of II.

8. Lajerran Long (20-cr-10308-MLW)

a.   Fact Summary

Between approximately December 2017 and January 2018, Long conspired with Josaphat

and Amos. Long introduced Josaphat to Amos (a bank teller at Santander Bank) and made a

payment to Amos for her role in facilitating fraudulent withdrawals from Santander Bank customer

accounts.

b.   Procedural Posture

Long pleaded guilty to a one-count Information charging 18 U.S.C. § 1349 (Bank Fraud

Conspiracy). Long was sentenced by Judge Wolf on October 20, 2021 to nine months of

imprisonment, three years of supervised release, and restitution of $357,333 (joint and several with

Josaphat and Amos).

9. Antonio Niati (18-cr-10341-MLW)

a.   Fact Summary

Iloba brought Niati into the scheme and provided Niati with fraudulent identification

documents. In approximately April 2017, Niati recruited Lafortune to open bank accounts in the

names of fictitious business entities and facilitated the provision of fake identification documents to Lafortune. Niati also recruited Chambers (a bank teller) to facilitate fraudulent withdrawals from accounts at Santander Bank.

b.   Procedural Posture

Niati pleaded guilty to a two-count Information charging 18 U.S.C. § 1349 (Bank Fraud Conspiracy) and 18 U.S.C. §§ 1028A and 2 (Aggravated Identity Theft; Aiding and Abetting). Niati's sentencing will be before Judge Wolf but has not yet been scheduled.

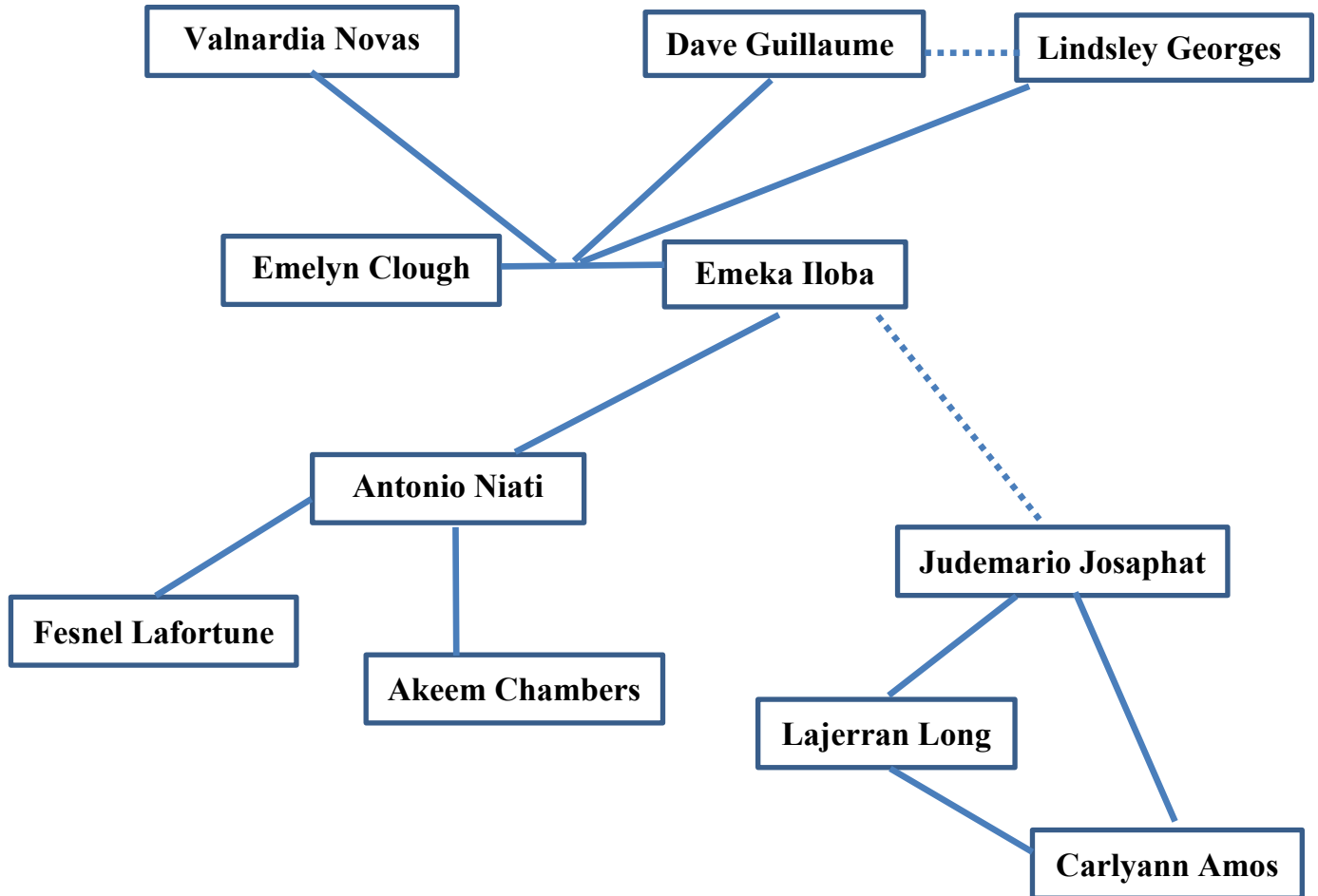10. **Valnardia Novas (20-cr-10221-DPW)**

a.   Fact Summary

Between approximately August 2017 and October 2017, Novas conspired with Clough and Iloba. Novas was a bank teller at TD Bank who was recruited by Clough and Iloba to facilitate fraudulent withdrawals from customer accounts.

b.   Procedural Posture

Novas pleaded guilty to a one-count Information charging 18 U.S.C. § 1349 (Bank Fraud Conspiracy). Novas was sentenced by Judge Woodlock on October 21, 2021, after consideration of a government motion filed under seal, to time served, three years of supervised release, and restitution of $341,433.84 (joint and several with Clough and Iloba).

DIAGRAM

(VISUAL DEPICTION OF KNOWN RELATIONSHIPS)

Relationships identified in charging documents

Relationships inferred from charging documents